

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
v.) Docket No.: 20-cr-10012-IT-1
PAUL BATEMAN)

ASSENTED TO MOTION TO EXTEND MOTION FILING DEADLINE

Comes now, Paul Bateman, through undersigned counsel, and moves this Court for its order extending the presently scheduled filing deadline of October 16, 2021. Mr. Bateman requests that this deadline be extended to November 12, 2021. As reason therefore, undersigned informs the court that work has begun on the anticipated motion to suppress and Franks motion, however undersigned will be on medical leave following surgery and does not anticipate being able to file the motion within the currently scheduled deadline. Undersigned has conferred with the government, who assents to this request. Further, Mr. Bateman agrees that this time should be excluded under 18 USC 3161(h)(7)(A) in the interests of justice and it is anticipated that the government will be filing an assented to motion to that effect.

Respectfully submitted,

PAUL BATEMAN
By his Attorney,

/s/ Brendan Kelley
Brendan Kelley
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on September 16, 2021.

/s/ Brendan Kelley
Brendan Kelley